

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM LEE BAILEY, (01),
a/k/a Lee Bailey
[DOB: 02/14/1987]

SAVANNAH SMITH, (02),
[DOB: 01/28/1991]

TRAVIS BAILEY, (03),
[DOB: 05/09/1990]

ERIC S. POSTON, (04),
[DOB: 09/01/1977]

BRANDON M. BEADEL, (05),
[DOB: 07/10/1986],

ALYSSA ENLOW, (06),
[DOB: 05/18/1994]

DENNIS L. MORRIS, (07)
[DOB: 02/27/1974]

and

DONALD R. POTTS, (08),
[DOB: 08/28/1962]

Defendants.

Case No. _____

COUNT ONE: (ALL DEFENDANTS)
(Conspiracy to Distribute a Controlled Substance)

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

COUNT TWO: (BEADEL)

(Possession with Intent to Distribute Methamphetamine)

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT: 5 Years' Imprisonment

NMT: 40 Years' Imprisonment

NMT: \$5,000,000 Fine

NLT: 4 Years' Supervised Release

Class B Felony

COUNTS THREE, FIVE, SEVEN and NINE:

(BAILEY, POSTON, BEADEL, POTTS)

***(Felon in Possession of a Firearm or
Ammunition)***

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT 10 Years' Imprisonment

NMT \$250,000 Fine

NMT 3 Years' Supervised Release

Class C Felony

\$100 Mandatory Special Assessment

COUNT FOUR: (BAILEY, SMITH, ENLOW)

(Possession with Intent to Distribute Methamphetamine)

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 18 U.S.C. § 2

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

COUNTS SIX and EIGHT:

(BAILEY and POSTON)

(Possession of a Firearm in Furtherance of a Drug Trafficking Offense)

18 U.S.C. § 924(c)(1)(A)(i)

NLT: 5 Years' Imprisonment (Consecutive)

NMT: Life Imprisonment (Consecutive)

NMT: \$250,000 Fine

NMT: Five Years' Supervised Release

Class A Felony

ALLEGATION OF CRIMINAL FORFEITURE

(ALL DEFENDANTS)

21 U.S.C. § 853

A \$100 Special Assessment for Each Felony Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	WILLIAM LEE BAILEY	1, 4, 5, 6
2	SAVANNAH SMITH	1, 4
3	TRAVIS BAILEY	1
4	ERIC S. POSTON	1, 7, 8
5	BRANDON M. BEADEL	1, 2, 3
6	ALYSSA ENLOW	1, 4
7	DENNIS L. MORRIS	1
8	DONALD R. POTTS	1, 9

AMENDED INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Distribute a Controlled Substance)

Between on or about August 1, 2019, and March 26, 2021, the exact dates unknown to the Grand Jury, within the Western District of Missouri and elsewhere, the defendants WILLIAM LEE BAILEY a/k/a "Lee Bailey", SAVANNAH SMITH, TRAVIS BAILEY, ERIC S. POSTON, BRANDON M. BEADEL, ALYSSA ENLOW, DENNIS L. MORRIS, and DONALD R. POTTS

and others both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

COUNT TWO
(Possession With Intent to Distribute Methamphetamine)

On or about March 16, 2021, in the Western District of Missouri, the defendant, BRANDON M. BEADEL, did knowingly and intentionally possess with intent to distribute five grams or more of methamphetamine (actual), a Schedule II controlled substance contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE
(Felon in Possession of Ammunition)

On or about March 16, 2021, in the Western District of Missouri, the defendant, BRANDON M. BEADEL, then knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition, to wit: 1 round of FC 9mm Luger ammunition (Federal), 3 rounds of WIN 9mm Luger ammunition (Winchester), and 3 rounds of CCI Luger 9mm ammunition (CCI), which had been transported in interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FOUR
(Possession With Intent to Distribute Methamphetamine)

On or about March 25, 2021, in the Western District of Missouri, the defendants, WILLIAM LEE BAILEY a/k/a “Lee Bailey”, SAVANNAH SMITH, and ALYSSA ENLOW aiding and abetting each other, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine,

a Schedule II controlled substance contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE
(Felon in Possession of a Firearm)

On or about March 25, 2021, in the Western District of Missouri, the defendant, WILLIAM LEE BAILEY a/k/a “Lee Bailey”, then knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, to wit: a Ruger SR9C, 9mm pistol bearing serial number 336-25356; and a Savage Arms 320, pistol-grip 12-gauge shotgun, with a defaced serial number, both of which had been transported in interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

COUNT SIX
(Possession of a Firearm in Furtherance of a Drug Trafficking Offense)

On or about March 25, 2021, in the Western District of Missouri, the defendant, WILLIAM LEE BAILEY a/k/a “Lee Bailey”, in furtherance of drug-trafficking crimes for which he may be prosecuted in a court of the United States as charged in Counts One and Five, that is, conspiracy to distribute methamphetamine and possession with intent to distribute methamphetamine, did knowingly possess firearms, to wit, a Ruger SR9C, 9mm pistol bearing serial number 336-25356; and a Savage Arms 320, pistol-grip 12-gauge shotgun, with a defaced serial number, contrary to the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN
(Felon in Possession of a Firearm)

Between on or about February 1, 2021, and May 6, 2021, in the Western District of Missouri, the defendant, ERIC S. POSTON, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: a Glock 19X, 9 mm handgun bearing serial number BGWR896, which had been transported in interstate

commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

COUNT EIGHT
(Possession of a Firearm in Furtherance of a Drug Trafficking Offense)

Between on or about March 14, 2021, and March 15, 2021, in the Western District of Missouri, the defendant, ERIC S. POSTON, in furtherance of drug-trafficking crime for which he may be prosecuted in a court of the United States as charged in Counts One, that is, conspiracy to distribute methamphetamine, did knowingly possess a firearm, to wit, a Glock 19X, 9 mm handgun bearing serial number BGWR896, contrary to the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT NINE
(Felon in Possession of a Firearm)

Between on or about February 1, 2021, and March 31, 2021, in the Western District of Missouri, the defendant, DONALD POTTS, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: a Glock 19X, 9 mm handgun bearing serial number BGWR896, which had been transported in interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the controlled substance offense alleged in Count One of this Indictment, the defendants, WILLIAM LEE BAILEY a/k/a “Lee Bailey”, SAVANNAH SMITH, TRAVIS BAILEY, ERIC S. POSTON, BRANDON M. BEADEL, and ALYSSA ENLOW,

DENNIS L. MORRIS, and DONALD R. POTTS shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count One of this Indictment, including, but not limited to the following:

A money judgment representing all proceeds the defendant obtained directly and indirectly as a result of his participation in the drug conspiracy alleged in Count One.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant, WILLIAM LEE BAILEY a/k/a “Lee Bailey”, SAVANNAH SMITH, TRAVIS BAILEY, ERIC S. POSTON, BRANDON M. BEADEL, ALYSSA ENLOW, DENNIS L. MORRIS, and DONALD R. POTTS:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

10/12/2022
DATE

/s/ Sharon Williams
FOREPERSON OF THE GRAND JURY

/s/ Sean T. Foley
Sean T. Foley
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Western District of Missouri